



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JMK/WMP  
F. #2013R00505

*271 Cadman Plaza East  
Brooklyn, New York 11201*

May 15, 2015

Eugene E. Ingoglia  
Morvillo LLP  
One World Financial Center, 27th floor  
New York, New York 10281

Re: United States v. Robert Bandfield  
Criminal Docket No. 14-476 (ILG)

Dear Mr. Ingoglia:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter. The materials in this production are produced on one disc and are Bates stamped/labeled EDNY-IPC-000023064 – EDNY-IPC-000026433 and EDNY-BZ-725075. This disclosure supplements the government's earlier disclosures under cover of letters dated October 10, 2014, December 4, 2014, March 4, 2015, March 27, 2015, April 16, 2015, and May 13, 2015. The government again requests reciprocal discovery. The enclosed disc contains copies of the following materials:

- GoDaddy account information for bob@ipc-offshore.com, glenna@ipc-offshore.com, and andrew@ipc-offshore.com (EDNY-IPC-000023064 – EDNY-IPC-000023606);
- GoDaddy email headers for ten @ipc-offshore.com email accounts produced pursuant to a 2703(d) Order dated September 17, 2013 (labeled EDNY-IPC-000023607);
- Google account information for baycapitalag@gmail.com (EDNY-IPC-000023608 – EDNY-IPC-000023629);
- Saxo Bank account records for Unicorn International Securities account #179638 and Titan International Securities account#176862INET (EDNY-IPC-000023630 – EDNY-IPC-000025839);
- Beaufort Securities Limited records for Unicorn International Securities (EDNY-IPC-000025840 – EDNY-IPC-000025954);

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- Vonage account information and records for (503) 305-3897 and (305) 671-3493 (labeled EDNY-IPC-000025955 – EDNY-IPC-000025956);
- Web.com email headers for eleven @ipcoffshore.com email accounts obtained pursuant to a 2703(d) Order dated September 17, 2013 (labeled EDNY-IPC-000025957 – EDNY-IPC-000025967);
- Yahoo account information for opulence10@yahoo.com (EDNY-IPC-000025968 – EDNY-IPC-000025979);
- Yahoo account information for opulence10@yahoo.com obtained pursuant to a 2703(d) order dated September 17, 2013 (EDNY-IPC-000025980 – EDNY-IPC-000025985);
- Spreadsheet of data collected pursuant to Pen Register Orders dated April 9, 2013, June 6, 2013, August 2, 2013, October 11, 2013, November 26, 2013 December 11, 2013, January 24, 2014, February 6, 2014, March 27, 2014, and April 8, 2014 (labeled EDNY-IPC-000025986);
- Pen Register Applications, Orders of Authorization, and Orders to Service Providers dated April 9, 2013, June 6, 2013, August 2, 2013, October 11, 2013, November 26, 2013 December 11, 2013, January 24, 2014, February 6, 2014, March 27, 2014, and April 8, 2014 (EDNY-IPC-000025987 – EDNY-IPC-000026196);
- 2703(d) Applications and Orders for GoDaddy.com, LLC, Network Solutions, LLC, and Yahoo! Inc. dated September 17, 2013 (EDNY-IPC-000026197 – EDNY-IPC-000026249);
- Commerzbank records for Unicorn International Securities, IPC Corporate Services Inc., Titan International Securities, Titan Marketing Corp, Legacy Global Markets, Vantage Securities, Altrix Capital, Belle Isle Investments, Mariah International, and Intraworld Securities (EDNY-IPC-000026250 – EDNY-IPC-000026259);
- MSN account information and records for ipc-offshore@hotmail.com (EDNY-IPC-000026260 – EDNY-IPC-000026288);
- Documents received by the Undercover Agent during the November 6, 2013 and March 4, 2014 Belize meetings and from Titan International Securities (EDNY-IPC-000026289 – EDNY-IPC-000026322);
- Copies of various items taken from the defendant and from Glenna Bergey upon the defendant's arrest (EDNY-IPC-000026323 – EDNY-IPC-000026363);

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- Search warrant signed on May 15, 2015 for two laptops and a flash drive seized at the time of the defendant's arrest (EDNY-IPC-000026364 – EDNY-IPC-000026411);
- Phone.com account information for (888) 400-5461 (EDNY-IPC-000026412 – EDNY-IPC-000026421);
- Skype records for usernames wentang.shen, goaxis, and renee.fitzgerald (EDNY-IPC-000026422 – EDNY-IPC-000026433); and
- Inventory for hard drives previously produced under cover of letters dated April 16, 2015 and May 13, 2015, containing electronic files from computers/hardware seized from the Belize offices of IPC, Titan International Securities, Legacy Global Markets, and Unicorn International Securities (labeled EDNY-BZ-000725075).

If you have any questions or requests regarding further discovery, please do not hesitate to contact us.

Very truly yours,

KELLY T. CURRIE  
Acting United States Attorney  
Eastern District of New York

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Enclosures

Cc: Clerk of Court (ILG) (by ECF) (w/o enclosures)